

# MEMO ENDORSED

Federal Defenders  
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*Executive Director*

Jennifer L. Brown  
*Attorney-in-Charge*

April 15, 2025

**VIA ECF and Email**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/16/25

**Re: United States v. Kenneth Ramsey  
24 Cr. 618 (VEC)**

Dear Judge Caproni:

I write to respectfully request that the Court temporarily modify the conditions of Mr. Ramsey's bail by extending his curfew hours to permit him to attend a very special family event and black-tie affair celebrating the 80<sup>th</sup> birthday of his uncle. The event is scheduled for April 19, 2025, from 8:30 pm to 2:00 am on April 20, 2025, at a venue in Brooklyn. See attached Invitation.

Mr. Ramsey currently has a curfew from 7:00 am to 9:00 pm and has been in full compliance with this condition of his bail. After consultation with Pretrial Services, PTSO Francesca Piperato approved Mr. Ramsey to attend the aforementioned event but will require him to be back home at 1:00 am on April 20, 2025.<sup>1</sup> My request to the Court is that the Court approve one additional hour and require that Mr. Ramsey be back home no later than 2:00 am on April 20, 2025. Mr. Ramsey lives in the Bronx, approximately 20 miles from the venue, and will take an Uber home after the event. Mr. Ramsey's sister, who is the co-signer on his bond, will be present at the event, as will many other family members and close family friends, some of whom will be traveling from other parts of the country to attend the event.

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<sup>1</sup> Mr. Ramsey's regularly assigned Pretrial Officer is Jonathan Lettieri, but he is currently out of the office until April 18, 2025.

The Government has no objection to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

*/s/ Amy Gallicchio*

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Amy Gallicchio  
Assistant Federal Defender  
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cc: AUSA Andrew Thomas  
PTSO Francesca Piperato  
PTSO Jonathan Lettieri

Application GRANTED. Mr. Ramsey must be home by no later than 2:00 A.M. on April 20, 2025.

4/16/25

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

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## EXHIBIT A

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evite.com/event/014



18



Invitation

Messages



YOU'RE INVITED TO A  
LEGENDARY CELEBRATION!

JOIN US FOR AN ELEGANT  
EVENING HONORING A TRUE  
FAMILY ICON, BANKS, ON HIS  
80TH BIRTHDAY!

THEME: "LEGENDS NEVER AGE:  
BANKS AT 80"  
DATE: APRIL 19TH  
TIME: 8:30 PM - 2:00 AM  
LOCATION: 562 GRAND AVE.,  
BROOKLYN, NY

DRESS CODE: BLACK TIE AFFAIR - DRESS TO IMPRESS AS WE  
CELEBRATE IN STYLE!

GET READY FOR A NIGHT FILLED WITH LAUGHTER, MEMORIES, AND  
SOULFUL SOUNDS—BECAUSE AS JAMES BROWN SAID, "PAPA'S GOT A  
BRAND NEW BAG!"

WE'LL HAVE A MEMORY CORNER CELEBRATING BANKS' INCREDIBLE  
LIFE, EXQUISITE FOOD, AND A DANCE FLOOR THAT'LL KEEP YOU  
MOVING ALL NIGHT!

RSVP TODAY!

LET US KNOW YOU'RE COMING TO CELEBRATE THIS REMARKABLE  
MILESTONE!

LET'S MAKE THIS A NIGHT TO REMEMBER—BECAUSE LEGENDS NEVER  
AGE!

WILL YOU BE ATTENDING?

Yes

No